



**Air Quality  
TIER I OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T1-2007.0061

**FACILITY ID No.:** 049-00003

**AQCR:** 63

**CLASS:** A

**SIC:** 2421

**ZONE:** 11

**UTM COORDINATE (km):** 566.2 , 5087.7

**1. PERMITTEE**

Bennett Forest Industries

**2. PROJECT**

Initial Tier I Operating Permit

**3. MAILING ADDRESS**

Rt. 1 Box 2L

**CITY**

Grangeville

**STATE**

ID

**ZIP**

83530

**4. FACILITY CONTACT**

Michael Atkinson

**TITLE**

CEO

**TELEPHONE**

(208) 983-0012

**5. RESPONSIBLE OFFICIAL**

Michael Atkinson

**TITLE**

CEO

**TELEPHONE**

(208) 983-0012

**6. EXACT PLANT LOCATION**

Highway 95, milepost 240.8

**COUNTY**

Idaho

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Sawmill – Dimensional Lumber

**8. PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page.

\_\_\_\_\_  
JONATHAN PETTIT, PERMIT WRITER

DEPARTMENT OF ENVIRONMENTAL QUALITY

\_\_\_\_\_  
MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER

DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:**

**Draft**

**DATE MODIFIED/AMENDED:**

**DATE EXPIRES:**

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## Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
Bldg	building
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
COMS	continuous opacity monitoring system
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic foot
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/mbf	pounds of emissions per thousand board feet of lumber
mbf	thousand board feet of lumber
mfr	manufacturer
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NSPS	New Source Performance Standards, 40 CFR 60
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/R	transformer/rectifier
T/yr	tons per year
UTM	Universal Transverse Mercator

## AIR QUALITY TIER 1 OPERATING PERMIT NUMBER: T1-2007.0061

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<b>Location:</b>	Grangeville, Idaho	

### 1. TIER I OPERATING PERMIT SCOPE

#### *Purpose*

- 1.1 This initial Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.
- 1.2 This Tier I permit incorporates the following permit(s):
- PTC No. P-050214, issued July 10, 2006

#### *Regulated Sources*

- 1.3 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

**Table 1.1 REGULATED SOURCES**

Permit Section	Source Description	Emissions Controls
2	Cyclone 12 - Sawmill Sawdust	Uncontrolled
	Cyclone 41 - Saw Sharpening Grindings	
	Cyclone 71 - Planer Chip Bin	
	Cyclone 73 - Planer Shavings Truck Bin	
	Cyclone 74 - Rosebud Bldg Planer Shavings (non-point source; vents into bldg)	
	<u>Fugitive Dust Sources</u> Includes but not limited to: roads, saws, debarker, disc screen, conveyors, material transfer/drop points, etc.	Dust control in accordance with a Fugitive Dust Control Plan
3	<u>Hog Fuel Boiler</u> Manufacturer: Wellons Model No.: 2DS2C8.0A Rated steam rate: 80,000 pounds per hour Fuel value: 8,750 Btu per dry pound	<u>Multiclone</u> Manufacturer: Wellons Model No.: W-144 Air flow rate: 64,500 CFM at sea level & 350 °F.  <u>Electrostatic Precipitator</u> Manufacturer: Wellons Model No.: Size No. 9 No. of T/R sets: 2
4	<u>Three Moore Dry Kilns</u> Manufacturer: Moore Length: 88 feet	Uncontrolled
	<u>Two Wellons Dry Kilns</u> Manufacturer: Wellons Length: 88 feet	
	Cyclone 11 - Sawmill Sawdust	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: CSM 60-20
	Cyclone 72 - Planer Shavings	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: unknown

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## 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

**Table 2.1 APPLICABLE REQUIREMENTS SUMMARY**

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11, 2.12
2.5	Odors	No emissions of odorous gas, liquids, or solids	IDAPA 58.01.01.775-776	2.6, 2.11, 2.12
2.7	Visible emissions	20 % opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11, 2.12
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9-2.9.5, 2.11, 2.12
2.10	Criteria air pollutants, opacity	Performance Testing	IDAPA 58.01.01.157 and 322.06, .08.a, .09	2.10, 2.12
2.13	Fuel-burning Equipment	Grain-loading standard	IDAPA 58.01.01.676-677	2.11, 2.12
2.14	Sulfur content	Compliance with IDAPA 58.01.01.728-729	IDAPA 58.01.01.728-729	2.14.2, 2.11, 2.12
2.15	Open burning	Compliance with IDAPA 58.01.01.600-617	IDAPA 58.01.01.600-617	2.11, 2.12
2.16	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11, 2.12
2.17	Recycling and emissions reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11, 2.12

### ***Fugitive Dust***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. To establish reasonable precautions, the Permittee shall develop, maintain and implement a Fugitive Dust Control Plan which identifies potential sources of fugitive dust and which establishes good operating practices for limiting the formation and dispersion of dust from those sources. The approved Fugitive Dust Control Plan is part of the terms and conditions of the permit.

The Fugitive Dust Control Plan (Plan) shall contain, at a minimum, the following information and requirements:

1. A general description of the potential sources of fugitive dust from the facility.
2. Application of water from a water truck, or a suitable dust suppressant (e.g., magnesium chloride), for control of dust on haul roads and loading areas. The Plan must establish criteria to determine when water and/or dust suppressant must be applied. Water does not need to be applied when the

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surface is wet (i.e. during/following rainy conditions) or when reduced ambient temperatures may cause the water to freeze. The applicant may choose to use surface improvements to existing roads, such as paving, in lieu of water application where appropriate to control fugitive dust.

3. Procedures for installing and using hoods, fans, fabric filters, or equivalent systems, where practical, to enclose/capture and vent the handling of dusty materials.
4. Procedures for covering, open-bodied trucks transporting materials likely to give rise to airborne dusts, paving roadways, and maintaining them in a clean condition, where practical.
5. Establish procedures for promptly removing earth or other stored material from streets, where practical.
6. Establish procedures to minimize dust formation during conveying operations such as installing sides/covers on conveyors, installation/use of a target box(es), and minimizing material drop heights.
7. Training/orientation of employees about the Fugitive Dust Control Plan procedures.
8. The initial Fugitive Dust Control Plan shall be submitted to DEQ for review and approval no later than 30 days after the issuance date of this permit. After approval of the initial plan, the permittee may update the plan at any time by submitting the proposed changes to DEQ for review and approval. The updated plan shall not become effective until approved by DEQ.
9. When in operation, the permittee shall comply with the provisions in the approved Fugitive Dust Control Plan at all times. Whenever an operating parameter is outside the operating range specified by the plan, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range.
10. A copy of the Fugitive Dust Control Plan shall remain onsite at all times.

**[IDAPA 58.01.01.650-651, 5/1/94]**

- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

**[IDAPA 58.01.01.322.06, 07, 5/1/94]**

- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

**[IDAPA 58.01.01.322.06, 07, 5/1/94]**

- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

**[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]**

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### **Odors**

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

### **Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

### **Excess Emissions**

#### *Excess Emissions - General*

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

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- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

*Excess Emissions – Startup, Shutdown, Scheduled Maintenance*

- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.a, 3/20/97]

[IDAPA 58.01.01.133.01.b, 4/5/00]

[IDAPA 58.01.01.133.01.c, 3/20/97]

*Excess Emissions – Upset, Breakdown, or Safety Measures*

- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]



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- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

**[IDAPA 58.01.01.134.02.b, 4/5/00]**

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

**[IDAPA 58.01.01.134.02.c, 3/20/97]**

- 2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

**[IDAPA 58.01.01.134.03 4/5/00]**

*Excess Emissions – Reporting and Recordkeeping*

- 2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

**[IDAPA 58.01.01.135.01 and 02, 3/20/97]**

- 2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

**[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]**

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

**[IDAPA 58.01.01.136.03.a, 4/5/00]**

**[IDAPA 58.01.01.136.03.b, 3/20/97]**

***Performance Testing***

- 2.10 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent

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decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F Street  
Lewiston, ID 83501  
Phone: (208) 799-4370  
Fax: (208) 799-3451

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

## ***Monitoring and Recordkeeping***

- 2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

The permittee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emissions unit did not operate at any time between required monitoring events, provided the following conditions are met:

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- The permittee makes a contemporaneous record in the log or file maintained on site of the date and time that the emission unit ceased operation, and the reason why the emission unit did not operate.
- The permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit resumed operation.

[IDAPA 58.01.01.322.07, 5/1/94]

### ***Reports and Certifications***

- 2.12 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F Street  
Lewiston, ID 83501  
Phone: (208) 799-4370 Fax: (208) 799-3451

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

### ***Fuel-Burning Equipment***

- 2.13 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

### ***Sulfur Content***

- 2.14 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
  - ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

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- 2.14.1 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94]

- 2.14.2 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

### ***Open Burning***

- 2.15 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

[IDAPA 58.01.01.600-617, 3/30/07]

### ***Renovation/Demolition***

- 2.16 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

### ***Recycling and Emissions Reductions***

- 2.17 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

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### 3. HOG FUEL BOILER

#### **Summary Description**

The Wellons hog fuel-fired boiler supplies up to 80,000 pounds per hour of steam to five kilns which are used to dry lumber. The rated heat input capacity of the boiler is 116 million Btu/hr.

The PM and PM<sub>10</sub> emissions from the boiler are controlled by a multiclone and an electrostatic precipitator (ESP).

**Table 3.1 HOG FUEL BOILER DESCRIPTION**

Emissions Unit / Process	Emissions Control Device
Hog fuel boiler	Multiclone and electrostatic precipitator

Table 3.2 contains only a summary of the specific permit requirements that apply to the Hog fuel boiler. Specific permit requirements are listed below Table 3.2.

**Table 3.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1	PM	6.6 lb/hr	PTC No. P-050214	3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, 3.12, 3.13, 3.14
3.2	PM	0.1 lb/MMBtu	40 CFR 60.43b	3.9, 3.13, 3.14, 3.15, and 3.16
3.3	Visible Emissions	1.) 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, and 2.) 20% opacity for no more than three minutes in any 60-minute period.	40 CFR 60.43b and IDAPA 58.01.01.625	3.7
3.4	Steaming rate	1.92 million pounds of steam per day	PTC No. P-050214	3.8

#### **Permit Limits / Standard Summary**

##### **3.1 PM<sub>10</sub> Emission Limit**

Emissions of PM<sub>10</sub> from the boiler stack shall not exceed 6.6 pounds per hour (lb/hr).

[PTC No. P-050214, 7/10/06]

##### **3.2 Particulate Matter Emission Limit in Accordance with 40 CFR 60.43b(c)(1) - NSPS**

Particulate matter emissions from the boiler shall not exceed 0.1 pounds per million Btu of heat input in accordance with 40 CFR 60.43b (c) (1). When compliance is determined, this shall be done by conducting a performance test as specified in 40 CFR 60.8.

[PTC No. P-050214, 7/10/06; 40 CFR 60.43b]

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**3.3     Opacity Limits**

- 3.3.1     On and after the date on which the initial performance test is completed or is required to be completed under 40 CFR 60.8, whichever date comes first, the boiler shall not discharge into the atmosphere any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, in accordance with 40 CFR 60.43b(f).

The particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction in accordance with 40 CFR 60.43b(g).

- 3.3.2     The permittee shall not discharge any air pollutant to the atmosphere from the boiler stack for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

**[IDAPA 58.01.01.625, 4/5/00; PTC No. P-050214, 7/10/06; 40 CFR 60.43b]**

***Operating Requirements***

**3.4     Daily Steam Production Limit**

The amount of steam produced by the boiler shall not exceed 1.92 million pounds of steam per day.

**[PTC No. P-050214, 7/10/06]**

**3.5     Fuel Type**

The permittee shall fire the boiler exclusively with wood products.

**[PTC No. P-050214, 7/10/06]**

**3.6     Control Device Requirements**

- 3.6.1     A multiclone and an ESP shall be used to control PM and PM<sub>10</sub> emissions from the boiler. The multiclone and the ESP shall be maintained in good working order and operated as efficiently as practical in accordance with the Operations and Maintenance (O&M) manual specifications required by Permit Condition 3.11. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

- 3.6.2     For the ESP, the permittee shall install, maintain, and operate, in accordance with the O&M manual specifications, equipment to measure the secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each transformer/rectifier (T/R) set to the discharge electrodes, and the spark rate, to demonstrate compliance with Permit Condition 3.6.3.

- 3.6.3     The secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate, of the ESP shall be maintained within O&M manual specifications. Documentation of O&M manual voltage, amperage, power input and spark rate specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

**[PTC No. P-050214, 7/10/06]**

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- 3.6.4 The following requirements apply to the modification or renewal of this Tier I operating permit. The specific operating range developed and listed in the O&M manual pursuant to permit condition 3.2 shall be incorporated into the modified or renewed permit as a federally enforceable permit condition. The permittee shall comply with all applicable compliance assurance monitoring provisions of 40 CFR 64, Compliance Assurance Monitoring.

**[DRAFT-40 CFR 64; IDAPA 58.01.01.322.01, 3/19/99]**

**3.7 Continuous Opacity Monitoring System (COMS) - NSPS**

- 3.7.1 For the boiler, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system in accordance with 40 CFR 60.48b(a) or per an EPA-approved alternative.
- 3.7.2 The COMS data shall be reduced and recorded in such a manner that compliance with all applicable opacity standards can be demonstrated.

**[PTC No. P-050214, 7/10/06; 40 CFR 60.48b]**

***Monitoring and Recordkeeping Requirements***

**3.8 Steam and Fuel Monitoring and Recordkeeping Requirements**

- 3.8.1 The permittee shall monitor and record the total pounds of steam produced by the boiler on a daily basis. Records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 3.8.2 For purposes of complying with the requirements under 40 CFR 60.49b(d), the permittee is not required to monitor the amount of wood combusted each day or to calculate the annual capacity factor for wood in accordance with the alternative method approved by EPA Region 10 in a letter issued to Bennett Forest Industries on October 4, 2005.

**[PTC No. P-050214, 7/10/06; 40 CFR 60.49b]**

**3.9 PM and PM<sub>10</sub> Performance Test**

At least once every five years the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the boiler stack. The test shall be conducted to demonstrate compliance with the emission rate limits specified by Permit Conditions 2.13, 3.1 and 3.3.2. Each performance test conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157, and the following information shall be complied with during each test run:

- Visible emissions from the boiler stack shall be observed and recorded using the methods specified in IDAPA 58.01.01.625 to demonstrate compliance with Permit Condition 3.3.2.
- The boiler shall be operated at the worst case normal feed material throughput rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- The following parameters shall be monitored and recorded during each PM and PM<sub>10</sub> performance test on the boiler stack:
- Wood-waste fuel analysis including percent moisture and BTUs per pound (Btu/lb)
  - Amount of steam produced in units of pounds of steam per hour; and

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- Secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each T/R set of the ESP to the discharge electrodes, and the spark rate.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM and PM<sub>10</sub> emission rate measured in the most recent test is less than or equal to 75% of the emission standard in Permit Condition 3.1, the next test shall be conducted within five years of the test date. If the PM and PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 3.1, the next test shall be conducted within two years of the test date. If the PM and PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 90% of the emission standard in Permit Condition 3.1, the next test shall be conducted within one year of the test date.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050214, 7/10/06]

### 3.10 Monitoring Requirement

When the boiler is operating, the permittee shall monitor and record the secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate at least once every four hours. The units of measure and averaging time of measurements of secondary voltage, amperage, power, and spark rate recorded shall be consistent with O&M manual units of measure. A compilation of the most recent five years of voltage, amperage, power and spark rate records shall be kept at the facility and shall be made available to DEQ representatives upon request.

[PTC No. P-050214, 7/10/06]

### 3.11 Operations and Maintenance Manual Requirements

Operation and Maintenance manuals (or a single manual) shall be maintained for the boiler, the multiclone, and the ESP. The permittee maintain an O&M manual for the multiclone and the ESP according to manufacturer specifications and recommendations. The manual(s) shall be revised within 30 days of issuance of this permit to incorporate any changes made as part of this permit. This manual shall describe the methods and procedures that will be followed to assure the boiler, multiclone, and the ESP are maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include the following , at a minimum: the most recent general descriptions of the equipment; manufacturer's recommended settings regarding secondary voltage, amperage and power for each T/R set of the ESP and the spark rate; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; inspection procedures and inspection frequency; upset conditions guidelines; and corrective action procedures.

[PTC No. P-050214, 7/10/06]

## ***Reporting Requirements***

### 3.12 Compliance Test Protocol

The permittee is strongly encouraged to submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by this permit. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

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### 3.13 Compliance Test Report

The permittee shall submit a report of the results of any compliance test and the results of any fuel analysis required in by this permit, including all required process data, to DEQ within 30 days after the date on which any required compliance test is concluded, in accordance with IDAPA 58.01.01.157.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050214, 7/10/06]

## ***NSPS General Provisions***

### 3.14 New Source Performance Standards 40 CFR 60, Subpart D

The permittee shall comply with Permit Conditions 3.2 through 3.15 developed based on, or taken from 40 CFR 60 Subpart A and Subpart Db for the Wellons boiler.

Should there be an inconsistency between 40 CFR 60 Subpart A and Subpart D, and Permit Conditions 3.2 through 3.15, requirements in 40 CFR 60 Subpart A and Subpart D shall govern.

The Administrator in 40 CFR 60 Subpart D is DEQ, unless otherwise stated.

[PTC No. P-050214, 7/10/06; 40 CFR 60 Subparts A and D]

### 3.15 NSPS 40 CFR 60 Subpart A –General Provisions

Generally applicable requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are summarized in Table 3.3. These summaries are provided to aid the permittee in understanding the general requirements and to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities. These summaries do not relieve the permittee from the responsibility to comply with all applicable requirements of the CFR, and are not intended to be a comprehensive listing of all requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern.

[PTC No. P-050214, 7/10/06; 40 CFR 60, Subpart A]

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**Table 3.3 NSPS Subpart A (40 CFR 60.1) Summary of General Provisions for Affected Facilities**

Section	Section Title	Summary of Section
60.4	Address	<p>All notifications and reports shall be submitted to:</p> <p>Lewiston Regional Office  Department of Environmental Quality  1118 "F" Street  Lewiston, ID 83501  phone: (208) 799-4370  fax: (208) 799-3451</p>
60.7(b),(c)(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> <li>• Notification of construction postmarked no later than 30 days of such date.</li> <li>• Notification of startup postmarked within 15 days of such date.</li> <li>• Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>• Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative.</li> <li>• For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30<sup>th</sup> and July 30<sup>th</sup> (in the format required by NSPS).</li> <li>• Maintain in a permanent form records suitable for inspection all measurements, system testing, performance measurements, calibration checks, adjustments and maintenance performed. Shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation.</li> <li>• CEMS record keeping requirements.</li> </ul>
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>• Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>• Compliance with opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test.</li> <li>• At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices.</li> <li>• For the purposes of determining compliance with standards any creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.</li> </ul>
60.12	Circumvention	No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.
60.13	Monitoring Requirements	All COMs and CEMs shall conform to the reporting, calibration and data reduction requirements specified in detail by this section. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COMs within 10 days before a performance test if using COMs to determine compliance with opacity during a performance test.

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#### 4. PRODUCTION EQUIPMENT

##### *Summary Description*

Bennett Forest Industries produces dimensional lumber products at the Grangeville facility. The processes include log handling, debarking, sawing, drying in kilns, planning, and material handling. Saleable products include dimensional lumber, wood chips, bark and rosebud horse bedding.

PM and hazardous air pollutant (HAP) emissions from the kilns are controlled by limitations on the amount of lumber that may be dried. Fugitive dust emissions from sources such as roads, saws, debarker, disc screen, conveyors and material transfer drop points are controlled per a site-specific Fugitive Dust Control Plan. PM emissions from five of the facility's material transfer system cyclones are uncontrolled and baghouses are used to control PM from the remaining two cyclones.

**Table 4.1 PRODUCTION EQUIPMENT DESCRIPTION**

Emissions Unit / Process	Emissions Control Device
Three Moore Dry Kilns Manufacturer: Moore Length: 88 feet	Uncontrolled
Two Wellons Dry Kilns Manufacturer: Wellons Length: 88 feet	
Cyclone 11 - Sawmill Sawdust	Baghouse Manufacturer: Clarke Sheet Metal Model No.: CSM 60-20
Cyclone 72 - Planer Shavings	Baghouse Manufacturer: Clarke Sheet Metal Model No.: unknown

Table 4.2 contains only a summary of the specific permit requirements that apply to the Hog fuel boiler. Specific permit requirements are listed below Table 4.2.

**Table 4.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1	HAP	10 T/yr of Methanol and 25 T/yr of any combination of hazardous air pollutants	IDAPA 58.01.01.008.10.a	4.3, 4.6, 4.7, 4.9
4.2	Formaldehyde	714 lb/yr	PTC No. P-050214	4.3, 4.8, 4.9
4.4	PM	Baghouse operation and maintenance	PTC No. P-050214	4.5, 4.10, 4.11

##### *Permit Limits/ Standard Summary*

##### **4.1 HAP Emission Limits**

The Bennett Forest Industries facility shall emit less than the following amounts of any hazardous air pollutant which has been listed pursuant to 42 U.S.C. Section 7412(b), as defined under IDAPA 58.01.01.008.10.a. For purposes of complying with this requirement, a year is defined as any consecutive 12-month period:

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4.1.1 10 tons per year of methanol; and

4.1.2 25 tons per year of any combination of any hazardous air pollutants

[IDAPA 58.01.01.008.10.a, 5/1/94; PTC No. P-050214, 7/10/06]

#### 4.2 Formaldehyde Emission Limit

The combined emissions of formaldehyde from all of the kilns shall not exceed 714 pounds per any consecutive 12-month period (lb/yr).

[PTC No. P-050214, 7/10/06]

### ***Operating Requirements***

#### 4.3 Kiln Throughput Limit

The total quantity of wood dried in the all of the kilns shall not exceed 250 million board feet per any consecutive 12-month period.

[PTC No. P-050214, 7/10/06]

#### 4.4 Baghouses

4.4.1 The permittee shall install, maintain and operate a Baghouse to control PM emissions from Cyclone 11 (sawmill sawdust) and a Baghouse to control emissions from cyclone 72 (planer shavings). Each Baghouse shall be operated at all times that the cyclone it is connected to is operating.

[PTC No. P-050214, 7/10/06]

4.4.2 When in operation, the pressure drop across each Baghouse shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for each Baghouse shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-050214, 7/10/06]

#### 4.5 Baghouse Monitoring Equipment

The permittee shall install, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across each Baghouse.

[PTC No. P-050214, 7/10/06]

### ***Monitoring and Recordkeeping Requirements***

#### 4.6 Methanol Monitoring

The total combined emissions of methanol from all of the lumber drying kilns (kilns) shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period (T/yr), to demonstrate compliance with Permit Condition 4.1.1 Methanol emissions from all of the kilns shall be calculated using the equation given below and the emission factors in Table 4.1, or DEQ-approved factors:

$$Ki \ln HAP = \sum_{i=1}^n (X_i \times Y_i) (ton / 2000lbs)$$

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Where:

Kiln HAP = Kiln Emissions of a specific HAP per month (ton/mo)

n = Number of types of wood dried

Xi = Throughput, in mbf, of lumber of type i dried in all kilns per month (mbf/mo)

Yi = Methanol emission factor for lumber of type i

**Table 4.1 HAP EMISSION FACTORS <sup>a</sup>**

Type of wood dried	Methanol <sup>b</sup> (lb/mbf)	Formaldehyde <sup>b</sup> (lb/mbf)	Acetaldehyde <sup>c</sup> (lb/mbf)	MEK <sup>c, d</sup> (lb/mbf)	Phenol <sup>e</sup> (lb/mbf)
Ponderosa	0.065	0.0029	0.0078	0.0013	0.004
White Fir	0.122	0.0028	0.0078	0.0013	0.004
Lodgepole	0.060	0.0040	0.0078	0.0013	0.004
Douglas Fir	0.023	0.0010	0.0078	0.0013	0.004

<sup>a</sup>Use the factors in this table, or DEQ-approved alternative factors in the kiln emissions equation

<sup>b</sup>Factors from the Oregon State University Small-scale Kiln Study, Milota, September 29, 2000

<sup>c</sup>NCASI factors as published in Table D-4 of the June 9, 2000 letter from K. Hanks, MRI, to M. Kissell, EPA

<sup>d</sup>Methyl ethyl ketone (MEK); pounds per 1000 board feet (lb/mbf)

<sup>e</sup>Olympic Region Clean Air Agency emission factor

**[PTC No. P-050214, 7/10/06]**

## **4.7 25 TPY HAP Monitoring**

4.7.1 The total combined emissions of all HAPs from all of the kilns and the Wellons Boiler shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period T/yr), to demonstrate compliance with the 25 TPY aggregate HAP limit given in Permit Condition 4.1.2.

4.7.2 The total HAP emissions from all of the kilns shall be determined by calculating the combined emissions of methanol, formaldehyde, acetaldehyde, methyl ethyl ketone (MEK), and phenol from all of the kilns using the equation specified in Permit Condition 4.6.

4.7.3 HAP emissions from the Boiler shall be calculated using the equation below.

$$BoilerHAP = \sum_{i=1}^n (X_i \times Y_i) (1/0.65) (995 Btu / lb - steam) (ton / 2000 lbs)$$

Where:

Boiler HAP = Boiler HAP emissions per month (ton/mo)

n = Number of different HAPs emitted by the Boiler

Xi = Steam production in million pounds per month (MMlb-steam/mo)

Y<sub>i</sub> = Emission factor for HAP “i” from AP-42 Section 1.6 or a DEQ-approved factor

**[IDAPA 58.01.01.008.10.a.ii, 5/1/94; PTC No. P-050214, 7/10/06]**

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#### 4.8 Formaldehyde Monitoring

The total combined emissions of formaldehyde from all of the kilns shall be calculated and recorded on a monthly basis, in units of pounds per month and pounds per consecutive 12-month period (lb/yr), to demonstrate compliance with the kiln emission limit in Permit Condition 4.2. The formaldehyde emissions shall be calculated using the equation given in Permit Condition 4.6.

[PTC No. P-050214, 7/10/06]

#### 4.9 Kiln Throughput

Each month, the permittee shall monitor and record the following kiln production information in units of board feet per month (bf/mo) and board feet per the most recent consecutive 12-month period (bf/yr):

- The quantity of each species of wood processed in all of the kilns; and
- The total sum of all wood species processed in all of the kilns.

[PTC No. P-050214, 7/10/06]

#### 4.10 Baghouse Operations and Maintenance Manual Requirements

An Operation and Maintenance manual shall be maintained to address each of the two baghouses. The permittee shall develop the O&M manual according to the manufacturer's specifications and recommendations for each baghouse. This manual shall describe the methods and procedures that will be followed to assure that each baghouse is maintained in good working order and operated as efficiently as practical. The O&M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment, the normal operating conditions, the manufacturer's recommended minimum and maximum pressure drops for each Baghouse, maintenance procedures, inspection procedures and inspection frequency, and upset condition guidelines.

[PTC No. P-050214, 7/10/06]

#### 4.11 Baghouse Pressure Drop Monitoring

When a Baghouse is operated, the permittee shall measure and record the following information on a weekly basis:

- The pressure drop across the Baghouse connected to Cyclone 11; and
- The pressure drop across the Baghouse connected to Cyclone 72.

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**Location:** Grangeville, Idaho**Facility ID No.** 049-00003**5. INSIGNIFICANT ACTIVITIES**

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

**Table 5.1 INSIGNIFICANT ACTIVITIES**

<b>Description</b>	<b>Insignificant Activities Citation</b>
Boiler relief valve(s)	IDAPA 58.01.01.317.01.a.1.77
Boiler blowdown	IDAPA 58.01.01.317.01.a.i.1,2
All facility fuel and volatile storage and transfer operations	IDAPA 58.01.01.317.01.b.i.1,2
Any onsite welding	IDAPA 58.01.01.317.01.b.i.9
Painting and coating operations	IDAPA 58.01.01.317.01.b.i.17,25
Kerosene, natural gas, or propane space heaters under 5 MMBtu/hr	IDAPA 58.01.01.317.01.b.i.18
Parts cleaning	IDAPA 58.01.01.317.01.b.i.26
All other facility fugitives emission sources, including: facility vehicle traffic, sawing, conveyors, transfer sources, storage sources, debarking, screening, hog, log watering system, and associated sources	IDAPA 58.01.01.317.01.b.i.30
Emergency diesel generator	IDAPA 58.01.01.317.01.b.i.30

There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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## 6. TIER I OPERATING PERMIT GENERAL PROVISIONS

### *General Compliance*

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### *Reopening*

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### *Property Rights*

6. This permit does not convey any property rights of any sort, or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### *Information Requests*

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.  
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]



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### ***Severability***

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

### ***Changes Requiring Permit Revision or Notice***

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/6/05; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/5/00; 40 CFR 70.4(b)(14) and (15)]

### ***Federal and State Enforceability***

12. Unless specifically identified as a “State-only” provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source’s potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a “State-only” provision are enforceable only in accordance with state law. “State-only” provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

### ***Inspection and Entry***

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee’s premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

### ***New Requirements During Permit Term***

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/6/05; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### ***Fees***

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387-397, 3/21/07; 40 CFR 70.6(a)(7)]

### ***Certification***

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### ***Renewal***

18. a. The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

### ***Permit Shield***

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

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- c. Nothing in this permit shall alter or affect the following:
- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

### ***Compliance Schedule and Progress Reports***

20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;  
40 CFR 70.6(c)(3) and (4)]

### ***Periodic Compliance Certification***

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- a. The compliance certifications for all emissions units shall be submitted annually from January 1<sup>st</sup> to December 31<sup>st</sup> or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
  - b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
  - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
    - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
    - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.

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Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

- iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- iv. Such information as the Department may require to determine the compliance status of the emissions unit.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

### ***False Statements***

- 22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

### ***No Tampering***

- 23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

### ***Semiannual Monitoring Reports***

- 24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be January 1<sup>st</sup> to June 30<sup>th</sup> and July 1<sup>st</sup> to December 31<sup>st</sup>. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### ***Reporting Deviations and Excess Emissions***

- 25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### ***Permit Revision Not Required***

- 26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

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[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

### ***Emergency***

27. In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]